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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION FOR LEAVE
TO LODGE MATERIALS UNDER SEAL**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure and Section 14.3
2 of the Revised Stipulation and Protective Order issued by this Court on February 10, 2016 (ECF
3 No. 217 at 15), Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez,
4 and Kyle Kingsbury on behalf of themselves and all others similarly situated (collectively,
5 “Plaintiffs”), hereby move this Court for leave to lodge certain documents under seal related to
6 their Memorandum of Law in Support of Plaintiffs’ Motion to Compel Defendant to Produce a
7 Log of Communications for Dana White’s Discoverable Telephone Numbers and Electronic
8 Communication Devices and Directing Defendant to Submit an Inventory of Electronic
9 Communication Devices.

10 First, Plaintiffs seek leave to lodge under seal portions of Plaintiffs’ Memorandum of Law
11 in Support of Plaintiffs’ Motion to Compel Defendant to Produce a Log of Communications for
12 Dana White’s Discoverable Telephone Numbers and Electronic Communication Devices and
13 Directing Defendant to Submit an Inventory of Electronic Communication Devices containing
14 confidential content from text messages produced on behalf of Defendant’s custodians.

15 Second, Plaintiffs seek leave to lodge under seal Exhibits 10-17, 24-29, 31-36 to Plaintiffs’
16 Memorandum of Law, which contain portions of text message compilations produced on behalf
17 of Defendant’s custodians.

18 Third, Plaintiffs seek leave to lodge under seal Exhibits 1-4, 6-9, 18-19, 21-23 to Plaintiffs’
19 Memorandum of Law, which contain confidential correspondence between the parties’ counsel.

20 Fourth, Plaintiffs seek leave to lodge under seal Exhibit 30 to Plaintiffs’ Memorandum of
21 Law, which contains portions of Lorenzo Fertitta’s deposition.

22 Plaintiffs have filed these documents, in accordance with the Court’s ECF system, with the
23 instant motion. Plaintiffs have filed placeholders for these documents with the Court, and will
24 serve un-redacted versions of these documents on Defendant.

DATED: May 9, 2017

/s/ Michael Dell'Angelo

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2017 a true and correct copy of
PLAINTIFFS' MOTION TO LODGE MATERIALS UNDER SEAL was served via email on
all parties or persons requiring notice.

/s/ Michael Dell'Angelo